

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	DATE FILED: _____
v.	:	CRIMINAL NO. _____
CURSHEENA PATTERSON	:	VIOLATIONS:
	:	18 U.S.C. § 1029(b)(2) (conspiracy to
	:	commit access device fraud - 1 count)
	:	18 U.S.C. § 1028A (aggravated identity
	:	theft - 1 count)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. Best Buy Co., Inc., Richfield, Minnesota, operated Best Buy retail stores, which purchased and sold merchandise, including computers, televisions and other electronic products, throughout the United States, including various locations in the Philadelphia, Pennsylvania area.

2. The Home Depot, Inc., Atlanta, Georgia, operated Home Depot retail stores, which purchased and sold merchandise, including building and maintenance supplies and products, in all fifty states in the United States, including various locations in the Philadelphia, Pennsylvania area.

3. Lowe's Companies, Inc., Mooresville, North Carolina, operated Lowe's retail stores, which purchased and sold merchandise, including building and maintenance supplies and products, throughout the United States, including various locations in the

Philadelphia, Pennsylvania area.

4. From in or about October, 2008, through in or about December, 2008, in the Eastern District of Pennsylvania, defendant

CURSHEENA PATTERSON

conspired and agreed, with others known and unknown to the United States Attorney, to commit an offense against the United States, that is, to knowingly and with intent to defraud, possess fifteen or more devices which are counterfeit or unauthorized access devices, that is, the names, addresses, social security numbers and dates of birth of individuals without their knowledge or consent, affecting interstate or foreign commerce, in violation of Title 18, United States Code, Section 1029(a)(3).

MANNER AND MEANS

It was part of the conspiracy that:

5. Defendant CURSHEENA PATTERSON obtained the names, addresses, social security numbers and dates of birth of K.R., J.S., A.K., V.D., R.S., M.D., E.G., J.S.1, T.L., J.N., L.B., D.D., J.W., K.V., L.G., T.H., and E.B., without their knowledge and consent, and provided that information to Person No. 1 known to the United States Attorney.

6. Person No. 1 used the names and identifying information of the victims to obtain counterfeit driver's licenses which were in the names of those victims, but which contained the photographs of Person Number 2 known to the United States Attorney (Person No. 2), Person Number 3 known to the United States Attorney (Person No. 3), and other persons unknown to the United States Attorney.

7. At the direction of Person No. 1, using the names, addresses, social

security numbers and dates of birth provided to Person No. 1 by defendant CURSHEENA PATTERSON, Person No. 2, Person No. 3 and persons unknown to the United States Attorney applied for lines of credit at different stores without the knowledge or consent of those persons.

8. At the direction of Person No. 1, Person No. 2 and Person No. 3 purchased at least \$56,267.21 of merchandise requested by Person No. 1, using the accounts Person No. 2 and Person No. 3 had opened with the names, addresses, social security numbers and dates of birth provided to Person No. 1 by defendant CURSHEENA PATTERSON.

OVERT ACTS

In furtherance of the conspiracy, defendant CURSHEENA PATTERSON, Person No. 1, Person No. 2, Person No. 3 and others known and unknown to the United States Attorney, committed the following overt acts, among others, in the Eastern District of Pennsylvania:

1. From in or about October, 2008, through mid-December, 2008, on a regular basis, defendant CURSHEENA PATTERSON, through her employment, obtained the names, addresses, social security numbers and dates of birth of K.R., J.S., A.K., V.D., R.S., M.D., E.G., J.S.1, T.L., J.N., L.B., D.D., J.W., K.V., L.G., T.H., and E.B., and provided that information to Person No. 1, without the knowledge or consent of those persons.

On or about the dates listed below, Person No. 1 caused Person No. 2, Person No. 3 and others unknown to the United States Attorney to make purchases and attempt to make purchases from retail stores, using lines of credit that had been opened using the names, addresses, dates of birth and social security numbers of individuals Person No. 1 had obtained from defendant CURSHEENA PATTERSON, without the knowledge and consent of those individuals:

Overt Act	Date	Store	Location	Victim	Purchase Amount
2	11/8/2008	Home Depot	Souderton	J.S.	\$3,631.53
3	11/8/2008	Best Buy	Downingtown	J.S.	\$2,167.68
4	11/9/2008	Home Depot	Souderton	J.S.	\$4,621.56
5	11/9/2008	Best Buy	Quakertown	J.S.	\$2,575.76
6	11/9/2008	Best Buy	Quakertown	A.K.	\$2,575.76
7.	11/10/2008	Home Depot	Montgomery	V.D.	\$3,163.04
8.	11/11/2008	Home Depot	Souderton	J.S.	\$ 339.55
9.	11/12/2008	Home Depot	Plymouth Meeting	V.D.	\$4,493.31
10.	11/13/2008	Lowe's	Montgomery	V.D.	\$2,649.77
11.	11/14/2008	Home Depot	Port Richmond	V.D.	\$ 332.03
12.	11/15/2008	Best Buy	Willow Grove	R.S.	\$3,908.41
13.	11/20/2008	Home Depot	Warrington	M.D.	\$3,375.04
14.	11/20/2008	Lowe's	Warrington	M.D.	-\$ 759.38 (return)
15.	11/21/2008	Lowe's	Warrington	M.D.	\$1,790.75
16.	11/22/2008	Home Depot	Warrington	M.D.	\$3,168.47
17.	11/26/2008	Home Depot	King of Prussia	E.G.	\$2,584.84
18.	11/28/2008	Home Depot	King of Prussia	E.G.	\$1,607.00
19.	12/4/2008	Home Depot	West Norriton	J.S.1	\$2,355.39
20.	12/5/2008	Home Depot	West Norriton	J.S.1	\$3,382.39

21.	12/5/2008	Lowes	Upper Moreland	J.S.1	\$1,450.87
22.	12/7/2008	Home Depot	Souderton	T.L.	\$2,615.66
23.	12/9/2008	Home Depot	Souderton	T.L.	\$ 1,666.24
24.	12/10/2008	Home Depot	Souderton	T.L.	\$ 586.87
25.	12/10/2008	Home Depot	Souderton	T.L.	\$1,564.98
26.	12/10/2008	Home Depot	Souderton	T.L.	-\$580.88 (return)
27.	12/14/2008	Home Depot	Philadelphia	J.N.	\$1,001.00

All in violation of Title 18, United States Code, Section 1029(b)(2).

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about November 4, 2008, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

CURSHEENA PATTERSON

knowingly and without lawful authority possessed and used a means of identification of another
person, that is, the name of J.S., during and in relation to access device fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(4).

**MICHAEL L. LEVY
UNITED STATES ATTORNEY**